

NORTH COAST UNIFIED AIR QUALITY MANAGEMENT DISTRICT

2300 Myrtle Avenue, Eureka, CA 95501

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November 9, 2006

Nancy Matthews
Sierra Research
1801 J Street
Sacramento, CA 95814

DOCKET	
06-AFC-7	
DATE	NOV 9 2006
RECD.	NOV 14 2006

Re: **Cumulative Impacts Analysis**
Humboldt Bay Repowering Project

Dear Ms. Matthews:

The North Coast Unified Air Quality Management District (AQMD) has reviewed Sierra Research's request for information dated September 15, 2006. Sierra Research has requested data on stationary sources of emissions within a six-mile radius of the Humboldt Bay Power Plant "which have received construction permits but are not yet operating, or are in the permitting process." This data would be used in a cumulative air quality modeling impacts analysis for the proposed Pacific Gas & Electric Repower Project. Sierra Research informed the AQMD that emission increases of less than 5 tons per year are *de minimis*.

The AQMD has reviewed its records and has determined that there are currently no increases in emissions greater than 5 tons per year, per source, for which permits to construct have been issued and that began operation after 2005; nor new projects for which permits to construct have not been issued but that are reasonably foreseeable, within the applicable area.

Notwithstanding the above statement, the AQMD has received documentation and correspondence from Evergreen Pulp, Inc. that they are considering increasing pulp production at their pulp mill located on the Samoa Peninsula, which is within the six-mile radius of the Power Plant. The AQMD has not received sufficient information on the proposed increase in production to evaluate potential emissions increases, however it is anticipated that a Prevention of Significant Deterioration (PSD) application will be submitted within the next calendar year. Should the AQMD receive further data from Evergreen Pulp, Inc. we will keep Sierra Research updated.

If you have any questions or comments, please do not hesitate to call my office at (707) 443-3093.

Sincerely,

Simona Altman
Permit Services Division Manager
NCUAQMD

cc: ***Richard L. Martin, Jr.***
Air Pollution Control Officer
NCUAQMD

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Plant Manager, HBPP Fossil
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